

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	CASE NO. <u>1:23cr44</u>
	:	
v.	:	JUDGE <u>Dlott</u>
	:	
WILLIAM LINDSAY,	:	<u>INDICTMENT</u>
ARNANDO MILLER,	:	
DERRAY KENNEDY,	:	18 U.S.C. § 2
MONAE MOSLEY, and	:	18 U.S.C. § 111
AMOS ASHLEY,	:	18 U.S.C. § 371
	:	18 U.S.C. § 1349
Defendants.	:	18 U.S.C. § 1704
	:	18 U.S.C. § 1708
	:	18 U.S.C. § 2114(a)
	:	

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. Defendants **WILLIAM LINDSAY, ARNANDO MILLER, DERRAY KENNEDY, MONAE MOSLEY** and **AMOS ASHLEY** are residents of the Southern District of Ohio.

The United States Postal Service

2. The United States Postal Service ("USPS") was an agency of the United States federal government that provided postal service in the United States. USPS operated post offices and stationed mail collection boxes at post offices and other locations in the State of Ohio and throughout the United States.
3. USPS collected postal mail deposited by postal customers into mail collection boxes and other authorized depositories, processed the mail for delivery to other postal customers at

designated addresses and post office boxes, and delivered the mail to those addresses and post office boxes.

4. USPS mail collection boxes were locked in order to maintain the security of postal mail deposited into them. USPS used Arrow keys to access postal mail deposited into locked collection boxes for processing and delivery to addresses and post office boxes.

COUNT 1
(Conspiracy to Commit Mail Theft)

The Conspiracy

5. Paragraphs 1-4 of the Indictment are incorporated as if fully restated herein.
6. From on or about June 2022 and continuing through on or about March 2023, in the Southern District of Ohio and elsewhere, the defendants, **WILLIAM LINDSAY, ARNANDO MILLER, DERRAY KENNEDY, MONAE MOSLEY** and **AMOS ASHLEY**, and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed to commit an offense against the United States, that is theft of mail and possession of stolen mail in violation of Title 18 United States Code, Section 1708.

The Manner and Means of the Conspiracy

7. The manner and means by which the Defendants sought to accomplish the objectives of the conspiracy included the following:
 - a. It was part of the conspiracy that members of the conspiracy, known and unknown to the Grand Jury, illegally obtained arrow keys that belonged to the U.S.P.S.
 - b. The arrow keys were then used by members of the conspiracy to steal mail from the blue mailboxes.

- c. After stealing the mail, members of the conspiracy would sometimes hide the stolen mail and/or USPS arrow keys at designated stash houses.
- d. Members of the conspiracy would steal any cash contained within the mail. Members of the conspiracy would also steal checks contained in the mail, “wash” or erase the true check information, and then change the check amount and recipient. The members of the conspiracy would then borrow accounts from associates, deposit the check made out to the associate into the account, and then withdraw the funds through ATMs.
- e. At times, the members of the conspiracy borrow or rent cars to execute this scheme and affix fake, temporary tags to the cars during the illegal activities.
- f. Members of the conspiracy would obtain access to bank accounts, deposit the fraudulent checks into such accounts, and withdraw the cash before the bank could detect the fraud.
- g. The conspiracy was executed by the Defendants primarily in the Cincinnati area.

Overt Acts

- 8. In furtherance of this conspiracy, the following overt acts were committed in the Southern District of Ohio by the Defendants and/or one of the coconspirators:
 - a. On or about October 28, 2022, coconspirator L.S. deposited a USPS mail package in the Southern District of Ohio for delivery to **ARNANDO MILLER** at a Miami, FL address. The mail package intended for **ARNANDO MILLER** contained 13

stolen debit cards, 48 checks and 9 money orders. The checks and money orders were stolen from the U.S. mail.

- b. On or about November 3, 2022, at approximately 9:36AM, a USPS blue box near 1801 Chase Ave, Cincinnati, OH 45223 was accessed and opened by members of the conspiracy. The car that perpetrated the theft at the blue box was an Infiniti with an Ohio License Plate #JTK5367 registered to **WILLIAM LINDSAY** and N.C.
- c. On or about February 2, 2023, members of the conspiracy illegally accessed a USPS blue collection box on St. Charles and Erie Avenue in Cincinnati and stole mail from the blue box.
- d. On or about February 2, 2023, **WILLIAM LINDSAY**, and others known and unknown to the grand jury, while driving a white Chevy Malibu without a license plate, accessed a blue USPS collection box near 2719 Madison Road, Cincinnati, Ohio and stole mail from the blue box.
- e. Members of the conspiracy took the stolen mail to specific stash houses and residences, including the residence of **AMOS ASHLEY** at 8010 Daly Road, Cincinnati, in order to sort and process the stolen mail. For example, conspirators took stolen mail from the February 2, 2023 blue box thefts described above to the 8010 Daly Road residence for processing. **ARNANDO MILLER, DERRAY KENNEDY, AMOS ASHLEY**, and **MONAE MOSLEY** participated in the handling of that stolen mail.
- f. On or about February 23, 2023, **ARNANDO MILLER, DERRAY KENNEDY**, and **MONAE MOSLEY** stole mail from two USPS blue mailboxes near Brentwood Plaza. They spotted a police cruiser and briefly pulled their car into a

driveway at 1009 Vacationland. The defendants hid the stolen mail under a vehicle in that driveway and drove away after the police had passed.

- g. On or about February 23, 2023, **DERRAY KENNEDY**, hid an arrow key in the back of a police cruiser when he was detained.
- h. On or about March 13, 2023, **WILLIAM LINDSAY** and two coconspirators planned and executed the robbery of USPS keys from a USPS postal carrier.

Specifically:

- i. On or about March 13, 2023, **WILLIAM LINDSAY** drove a car with two other individuals into the Fay Apartments complex in Cincinnati, Ohio.
- ii. **WILLIAM LINDSAY** dropped off the two coconspirators and then **WILLIAM LINDSAY** briefly waited in a relative's apartment in the vicinity.
- iii. The other two coconspirators (while wearing masks) followed a postal carrier and entered one of the apartment buildings.
- iv. When the postal carrier entered the building, the two coconspirators stole the postal carrier's official keys and ran.
- v. **WILLIAM LINDSAY** picked up the two coconspirators in the vehicle and fled the scene.
- vi. **WILLIAM LINDSAY** then took part of the postal carrier's key tag to the residence at 8010 Daly Road, where it was later recovered.

In violation of 18 U.S.C. § 371.

COUNT 2

(Possession of Stolen Mail – Springfield Twp.)

9. On or about February 23, 2023, in the Southern District of Ohio, the defendants, **ARNANDO MILLER, DERRAY KENNEDY, and MONAE MOSLEY**, did unlawfully possess letters, mail, and articles (“letters”), which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle, which was an authorized depository for mail matter, knowing said letters to have been stolen or taken from an authorized depository for mail matter; to wit, the stolen mail recovered during a police stop in Springfield Township.

In violation of 18 U.S.C. §§ 1708(c) and 2.

COUNT 3

(Possession of Stolen Mail Key – Springfield Twp.)

10. On or about February 23, 2023, in the Southern District of Ohio, the defendants, **ARNANDO MILLER and DERRAY KENNEDY**, aided and abetted by others known and unknown to the Grand Jury, did knowingly steal, purloin, and obtain by false pretense an “arrow key”, that is, a key suited to locks adopted by the Postal Service and in use on mail depository boxes or other authorized receptacles for the deposit of mail matter.

In violation of 18 U.S.C. §§ 1704 and 2.

COUNT 4

(Possession of Stolen Mail – 8010 Daly Road)

11. On or about March 1, 2023, in the Southern District of Ohio, the defendants, **ARNANDO MILLER, DERRAY KENNEDY, AMOS ASHLEY, and MONAE MOSLEY**, did unlawfully possess letters, mail, and articles (“letters”) which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing said letters to have been stolen or taken from an

authorized depository for mail matter; to wit, the stolen mail recovered from a trash pull at 8010 Daly Road, Cincinnati, Ohio.

In violation of 18 U.S.C. §§ 1708(c) and 2.

COUNT 5

(Robbery of Person Carrying U.S. Property)

12. On or about March 13, 2023, in the Southern District of Ohio, the defendant, **WILLIAM LINDSAY**, did assault and rob a postal carrier (Victim 1), a person having lawful charge, custody, and control of United States mail matter and other property of the United States, with intent to rob, steal, and purloin said mail matter and property of the United States, to wit, the assault and robbery of Victim 1's postal carrier's keys at the Fay Apartments.

In violation of 18 U.S.C. §§ 2114(a) and 2.

COUNT 6

(Assault of Government Employee)

13. On or about March 13, 2023, in the Southern District of Ohio, the defendant, **WILLIAM LINDSAY**, and others, did knowingly and forcibly assault, intimidate, oppose, impede, and interfere (and aided and abetted each other in the same) of a United States postal carrier who was an employee of an agency of the U.S. government while such employee was engaged in and on account of the performance of official duties; and such acts were done with the intent to commit another felony, that is, the theft of mail pursuant to 18 U.S.C. § 1708.

In violation of 18 U.S.C. §§ 111(a) and 2.

COUNT 7
(Conspiracy to Commit Bank Fraud)

The Conspiracy

14. Paragraphs 1 – 4 of the Indictment are incorporated as if fully restated herein.
15. BANK 1 is a bank with offices and branches within the Southern District of Ohio. BANK 1 is a financial institution insured by the Federal Deposit Insurance Corporation.
16. From on or about June 2022 and continuing through on or about March 2023, in the Southern District of Ohio, the defendants, **ARNANDO MILLER, WILLIAM LINDSAY, and MONAE MOSLEY**, and others known and unknown to the Grand Jury, knowingly, and with intent to further the conspiracy and to defraud, conspired and agreed with each other and with others known and unknown to the Grand Jury to execute a scheme and artifice to defraud BANK 1, and to obtain monies, funds, and property owned by and under the custody and control of BANK 1 by means of materially false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. §§ 1344 and 2.

Purpose and Object of the Conspiracy

17. The purpose and object of the conspiracy was for the defendants, **WILLIAM LINDSAY, ARNANDO MILLER, and MONAE MOSLEY**, and others known and unknown to the grand jury, to unlawfully enrich themselves by fraudulently converting the financial instruments stolen from the mail to their own financial benefit.

The Manner and Means of the Conspiracy

18. The manner and means by which the Defendants sought to accomplish the objectives of the conspiracy included the following:

- a. Members of the conspiracy would obtain stolen financial instruments, such as checks and money orders, from stolen mail.
- b. Members of the conspiracy would “wash” the financial instruments to remove the ink and true information. They would then add false information to the check, altering the recipient of the check and the amount.
- c. Members of the conspiracy would obtain access to bank accounts, deposit the fraudulent checks into such accounts, and then withdraw the cash before the bank could detect the fraud.
- d. For example, a check for \$978.95 was stolen from the mail. A conspirator altered the check, adding a new recipient for an altered amount of \$4,760 and deposited into a borrowed account on August 4, 2022. Both **ARNANDO MILLER** and **WILLIAM LINDSAY** then withdrew the funds from a BANK 1 ATM on August 11, 2022.
- e. In addition, at times, members of the conspiracy took checks that were stolen from the mail and then created or reproduced new checks using the same account numbers.

In violation of 18 U.S.C. § 1349.

A TRUE BILL.



FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY



TIMOTHY S. MANGAN, 069287
ASSISTANT UNITED STATES ATTORNEY